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WT DOCKET NO. 10-119

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Robert W. Stevens

WT Docket No. 98-182

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JULY 1, 2010

Response to F.C.C. Notice of proposed Rulemaking 10-106

Dear F.C.C.,

My name is Robert Stevens, I have been a Licensed C B radio user (K BOX 7980) Since March 1, 1980, received my GMRS Radio Station Authorization (WPVU 308) on July 9, 2002 and earned my amateur radio license (KGETRR) January 29, 2004.

As a concerned citizen with many years of experience using Two way radio governed by part 95 I am responding to your request for public comment on NPRM 10-106. My responses to the questions posed in the NPRM will be referenced to the paragraph number that asks the question without me repeating the question. I am not a highly educated man so please bear with me.

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Response to NPRM 10-106

SECTION III A:

10. Yes, consolidate with fact sheet available.

11. Yes, plain language rules are desirable for a radio service intended for general public use.

12. Yes, consolidation is good for public understanding.

14. No, many older CB radios and to a lesser extent GMRS radios are still in use. Therefore, the frequency stability rule is still needed to minimize adjacent channel interference.

16. ERP is the best standard to base transmitter power. The formula to calculate ERP is reasonably easy to understand and is the best method of measurement for CB, GMRS and MURS where external antennas are common. An increase of power is not needed in the CB, FRS, GMRS or MURS radio service.

18. Your assumption is incorrect, many older CB radios (late 60's to 70's) are still in use. I own and occasionally operate a Tram Diamond D 201 CB. Consolidation and revision make good sense so long as the spurious emission standards that pertain to older equipment (especially CB) remain in Part 95 technical rules.

20. Yes, voice scrambling should not be allowed on CB, FRS, GMRS or MURS. The prohibition of digital voice should be reconsidered regarding GMRS as the digital modes (APCO 25) require less spectrum yet provide good quality communications.

22. Yes, Section 95.651 should be retained and revised as specified.

Response to NPRM 10-106

Section III B;

27. No, the GMRS should continue to be a licensed radio service. Many of the GMRS users are involved in emergency and disaster communications either through organizations such as R.E.A.C.T., C.E.R.T., Neighborhood watch or as individuals who happen upon the scene of a serious traffic accident, medical emergency, fire or crime in progress. Having an F.C.C. issued call sign as a means of positive identification greatly aids the authorities in contacting the reporting party for witness statements, etc. as the person reporting the incident may be passing through the radio coverage area of the repeater or base station who is handling the emergency traffic and not known to the regular users of GMRS in the area, therefore, GMRS must not be licensed by rule and the identification requirement must be maintained.

28. Yes, the 10 year license term for GMRS would decrease the burden and standardize the license. I would even suggest a fee increase.

29. No, the age of consent is 18 years. We cannot expect a adolescent to fully comprehend the rules and regulations governing a radio service where no exam on rules or technical specifications is required, nor can we expect them to comprehend the consequences of violating said rules.

Responses to Nprm 10-106

Section III B;

30. the eligibility requirement must be maintained to insure congestion free communications for individuals especially emergency and family based communications. If you must remove individual licensing I suggest you limit eligibility to 501(c) 3 non-profit organizations and require carrier squelch monitoring and/or busy channel lockout before transmitting.

32. two watts ERP is perfect for the blisster pack portables. However, most serious GMRS users prefer Part 90 approved portables that typically put out 4 to 5 watts ERP which provides more reliable performance given the fact that many of the GMRS stations utilize their radios for traveler assistance, emergency/disaster preparedness, neighborhood watch etc. Regarding RF exposure limits, this seems to be a mute point as part 97 amateur 70 cm band radios emit 4 watts in a similar frequency range with routine exposure evaluation not being required for under 70 watts.

33. Routine exposure evaluations should be required for base and mobile GMRS stations due to increased ERP through the use of gain antennas.

Response to NPRM 10-106

Section III B;

34. The 50 watt power limit should be maintained for base and mobile. The standard of measurement should be changed to ERP for all classes of stations. Antenna Height should be limited to 20 feet above the roof or tree which it is mounted, not to exceed 60 feet above ground level. The GMRS repeaters provide a vital communications resource. We all have seen how the cell phone system quickly becomes over burdened during a disaster rendering it inoperable, while the GMRS repeaters with back up power continue to function. This allows the various emergency preparedness groups (many of which do not have the financial resources to obtain a business band license/station) to pass health and welfare information to family members and/or other stations who may have means of reaching an out-of-state contact person via amateur radio or satellite phone. Last but not least, the GMRS repeaters provide a stepping stone to amateur radio. Countless people have heard the GMRS repeaters on their \$29.95 blister pack radio and inquired as to how they can join in the fun. I personally have been responsible for bringing more than twenty people onboard as licensed GMRS users, seven of whom have gone on to earn their amateur radio license.

Response to NPRM 10-106

Section III B;

35. No, Power measurement should be ERP for all classes of transmitters.

If you decide to change the power measurement to transmitter output directional antennas should be limited to no more than three elements with the height limit that I suggest in my response to question 34.

36. Yes, narrowbanding GMRS is a good idea. I cannot see many users objecting to this proposal.

37. Unknown as to the time required for manufacturers to transition to narrowband, use your best judgement.

38. The rule should be retained unless you can positively confirm that no such operation continues to this date.

42. The public benefit of GPS data sent over GMRS is clear. However, I have to agree with the comments of NCGUR regarding interference.

Safeguards must be put in place to deal with the potential congestion resulting from business using GMRS. See my response to questions 27, 29 and 30. The channels that permit GPS and text transmissions should be limited to the 462 MHz channels that are shared with FRS. The data transmissions should last no longer than three seconds.

47. Yes, I see no need for combination FRS radios that can operate on a licensed radio service. With the thousands of combo radios already in the hands of the public, it must be stressed that the user have proper licensing before transmitting or face severe civil and possibly criminal penalties.

Response to NPRM 10-106

Section III D;

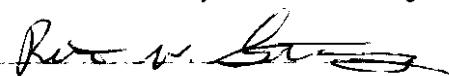
53. I agree with omnitronics, a hands free wireless microphone for CB is needed. The emission limit proposal seems adequate. Any manufacturer should be allowed to produce a hands free wireless microphone so long as it meets the technical specifications set forth by the commission. I see no problem with allowing Blue tooth type devices to be used with a CB radio.

55. The minimum amount of time to pass the message should be the rule for continuous transmissions not to exceed three minutes. The five minute conversation limit and the one minute stand by rule are no longer needed. Under no circumstances what so ever should the transmitting of whistling, sound effects or attention attracting noise be permitted. Music on the other hand if it is part of the conversation (eg: do you remember this song, trivia) will not be a problem.

56. Your proposal to remove section 95.607 and consolidate into 95.33 is okay.

57. The problem is the 27 MHz frequency range that CB radios operate in. There is no way to limit skywave propagation, so why make it illegal. Directional antennas should be limited to three elements. A reduction in power is not needed being most CB radios nowadays are used in mobile installations with unity gain antennas. The commission must actively seek out and prosecute CB operators who use amplifiers or operate out of band.

Respectfully submitted,



Robert W. Stevens.